

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
SOUTHERN DIVISION

Civil Action No. 7:11-CV-00169-BO

CHRISTINA LYNN JACOBS,)	
Plaintiff,)	
)	
v.)	DEFENDANTS'
)	MOTION FOR
N.C. ADMINISTRATIVE OFFICE)	SUMMARY JUDGMENT
OF THE COURTS, and JAN)	
KENNEDY in her official capacity as)	
NEW HANOVER COUNTY CLERK)	(Fed. R. Civ. P. 56)
OF SUPERIOR COURT,)	
Defendants.)	

NOW COME the Defendants, by and through Roy Cooper, North Carolina Attorney General, Valerie L. Bateman, Special Deputy Attorney General, and Kathryn Shields, Associate Attorney, pursuant to Rule 56 of the Federal Rules of Civil Procedure, and move this Court to grant Defendants' summary judgment on Plaintiff's Complaint. In support of this motion the undersigned submit a contemporaneously filed memorandum in support, and the Affidavits of Sandra J. Gerstenmier, Teresa Caison, John Owen Plummer Mathis, Ashley Stewart, Bert Croom, and George P. Corvin, M.D. and their attachments; the Depositions of Jan Kennedy, Brenda Tucker, Debra Excell, Melissa Griffin, Alice Radewicz, Ashley English and Plaintiff Christina Jacobs, and Exhibits 1-53 referred to therein.

Respectfully submitted, this the 31st day of October, 2012.

ROY COOPER
Attorney General

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CERTIFICATE OF FILING AND SERVICE

This is to certify that the undersigned has this day electronically filed the foregoing MOTION FOR SUMMARY JUDGMENT, AFFIDAVITS AND ATTACHMENTS, DEPOSITIONS AND EXHIBITS with the Clerk of Court using the CM/ECF system, which will send notification of such filing to counsel for the plaintiff, Vanessa K. Lucas, Lisa Grafstein, and A. Mercedes Restucha-Klem.

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This the 31st day of October, 2012.

/s/ Valerie L. Bateman.
Special Deputy Attorney General

/s/ Kathryn H. Shields
Associate Attorney General